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 RANGERS, INC.  
 19

20 **UNITED STATES DISTRICT COURT**  
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
 22

23 CORY SPENCER, an individual;  
 24 DIANA MILENA REED, an  
 individual; and COASTAL  
 25 PROTECTION RANGERS, INC., a  
 26 California non-profit public benefit  
 corporation,  
 27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' APPLICATION FOR  
 LEAVE TO FILE DOCUMENTS  
 UNDER SEAL**

Filed Concurrently with Declaration of  
 Samantha Wolff; Redacted Version of  
 Documents Proposed to be Filed Under  
 Seal; Unredacted Version of Documents  
 Proposed to be Filed Under Seal: and

[Proposed] Order

v.

LUNADA BAY BOYS; THE  
 INDIVIDUAL MEMBERS OF THE  
 LUNADA BAY BOYS, including but  
 not limited to SANG LEE, BRANT  
 BLAKEMAN, ALAN JOHNSTON  
 AKA JALIAN JOHNSTON,  
 MICHAEL RAE PAPAYANS,  
 ANGELO FERRARA, FRANK  
 FERRARA, CHARLIE FERRARA,  
 and N. F.; CITY OF PALOS VERDES  
 ESTATES; CHIEF OF POLICE JEFF  
 KEPLEY, in his representative  
 capacity; and DOES 1-10,

Defendants.

Complaint Filed: March 29, 2016  
 Trial Date: November 7, 2017

Pursuant to Local Rule 79-5, Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. ("Plaintiffs") hereby apply for leave of Court to file the following documents under seal: (1) Plaintiffs' Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, In the Alternative, Summary Adjudication ("Plaintiffs' Opposition"); (2) Plaintiffs' Additional Material Facts in Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, in the Alternative, Summary Adjudication ("Plaintiffs' AMF"); and (3) Declaration of Kurt Franklin in Opposition to Defendants City of Palos Verdes Estates and Chief of Police Jeff Kepley's Motion for Summary Judgment or, in the Alternative, Summary Adjudication ("Franklin Declaration"). Each of these documents reference information contained in Exhibit 21 to the Franklin Declaration, which Exhibit was also the subject of Plaintiffs' Application for Leave to File Documents Under Seal (Dkt. No. 311).

Exhibit 21 is a report prepared by a third-party investigator retained by the City on an investigation into the source of a leak of a Palos Verdes Estates Police Department undercover operation ("Report"). This Report was produced in discovery by the City of Palos Verdes Estates (City) and marked as "CONFIDENTIAL" pursuant to the parties' stipulated protective order. *See* Franklin Decl. at ¶ 31. Although Plaintiffs dispute the confidential nature of this document, Plaintiffs nonetheless submit this application to file the Report under seal in accordance with the Local Rules and the parties' stipulated protective order.

Counsel for the City was previously informed of Plaintiffs' intent to seek leave to file Exhibit 21 under seal.<sup>1</sup> *See* Declaration of Samantha Wolff In Support of Application for Leave to File Under Seal, filed in support of Plaintiffs' Application to file Exhibit 21 under seal. Dkt. No. 312 ¶ 2.

DATED: August 1, 2017

HANSON BRIDGETT LLP

By: /s/ Samantha D. Wolff  
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 RANGERS, INC.

<sup>1</sup> Plaintiffs sought leave to file Exhibits 21 and 15 under seal, however, the unredacted/confidential contents Exhibit 15 are not referenced in Plaintiffs' Opposition, Plaintiffs' AMF, or the Franklin Declaration.